



March 20, 2023

By ECF and Email

Hon. Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

**Re: *International Business Machines Corporation v. Patama Chantaruck*
Case No. 23-cv-1191-CS**

Dear Judge Seibel:

We write on behalf of defendant Patama Chantaruck to respectfully request that her time to answer or otherwise respond to the Complaint be extended from March 20, 2023 through April 19, 2023 to allow her adequate time to investigate and prepare her response. Plaintiff has consented to Ms. Chantaruck's request, which is her first request for an extension. Ms. Chantaruck reserves all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action.

We thank Your Honor for your consideration.

Respectfully submitted,

/s/ Kim L. Michael
Kim L. Michael

cc: All counsel of record by ECF

SO ORDERED:

Hon. Cathy Seibel, U.S.D.J.